January 1, 2015

PO Box 37 Tenakee Springs, AK 99841

Alaska Department of Fish and Game Board of Fisheries PO Box 115526 Juneau, AK 99811-5526



RE: Proposal 69 - 5 AAC 32.150 Closed waters in Registration Area A.

I oppose the above proposal. If enacted, it would most likely reduce the overall net harvest by commercial crabbers by drastically reducing Dungeness reproduction in Tenakee Inlet. The current system, which only permits sport and subsistence crabbing, has much less of an impact on Dungeness crab population and, therefore, favors greater reproductive success by crabs in the closed area. The pelagic crab larvae from the closed waters disperse in Tenakee Inlet and, thereby, most likely contribute significantly to the harvest by commercial crabbers. Commercial crabbers living in Tenakee Springs are familiar with the current system and agree that their harvests are enhanced (and essentially sustained) by the closed waters, much like what has been proven to occur in areas around designated Marine Reserves.

Proposal 69 was written with a justification based entirely on a rough estimate of the population of Tenakee Springs. This is weak justification. Before this proposal should be given serious consideration, field studies should be conducted to determine, if enacted, whether it would destroy or damage commercial crabbing in Tenakee Inlet. Furthermore, before this proposal should be considered, the committee making the decision should have information about what the economic and social impacts this change would have on those of us who live in Tenakee Inlet.

Sincerely,

Frank L. Moore, PhD

Oregon State University Distinguished Professor of Zoology Emeritus